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*Lead Counsel for the Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST

MDL No. 1917

This Document Relates to:  
  
ALL INDIRECT PURCHASER ACTIONS

**DECLARATION OF JANET S. NETZ  
IN SUPPORT OF INDIRECT  
PURCHASER PLAINTIFFS'  
OPPOSITION TO IRICO GROUP  
CORP. AND IRICO DISPLAY CO.,  
LTD.'S MOTION FOR SUMMARY  
JUDGMENT**

Judge: Hon. Jon S. Tigar

1 I, Janet S. Netz, declare as follows:

2 1. I make this declaration in support of the Indirect Purchaser Plaintiffs' ("IPPs") Opposition  
3 to the Motion for Summary Judgment ("Motion") filed by Irico Group Corp. and Irico Display Devices  
4 Co., Ltd. (together, "Irico").

5 2. I am a founding partner of appleEcon, LLC. I have been a tenured Associate Professor of  
6 Economics at Purdue University and a Visiting Associate Professor at the University of Michigan. I  
7 received a B.A. (1986) from the University of California, Berkeley, cum laude, and an M.A. (1990) and  
8 Ph.D. (1992) from the University of Michigan, all in Economics. My doctoral fields of study were  
9 Industrial Organization – the study of firm interaction and market performance – and International Trade  
10 and Finance.

11 3. I and my staff have reviewed the data produced in this litigation by Philips Consumer  
12 Electronics USA ("Philips"), Best Buy Co., Inc. ("Best Buy"), and Circuit City Stores Inc. ("Circuit  
13 City"). Those data show sales of the Philips Magnavox CRT television "14MS2331/17" and the Insignia  
14 CRT television "ISTV040919" throughout the United States during the Class Period.

15 **Best Buy data:**

16 4. The Philips Magnavox CRT television model "14MS2331/17" corresponds to SKU  
17 7023623 in the Best Buy data, as shown in BBYCRT000080 (Best Buy SKU to manufacturer product  
18 number mapping). The Best Buy in-store sales data, BBYCRT000083 - BBYCRT000094, show sales of  
19 this SKU to 49 states plus DC, including all 20 states listed on page 6 of Irico's Motion for Summary  
20 Judgment.

21 5. The Best Buy online data (BBYCRT000095 - BBYCRT000102) also show that this  
22 Philips television "14MS2331/17" was sold to 37 states and the District of Columbia. The Best Buy  
23 online sales data show sales of the Philips television to all 20 states listed in Irico's Motion for Summary  
24 Judgment except in Hawaii, Maine, Mississippi, New Mexico, South Dakota, and West Virginia.

25 6. The Insignia television model ISTV040919 corresponds to SKU 7005787 in the Best Buy  
26 data. BBYCRT000080. This SKU was sold in 49 states plus the District of Columbia according to Best  
27 Buy's in-store sales data (BBYCRT000083 - BBYCRT000094).

1 **Circuit City**

2 7. Circuit City's sales data (CC-000001) show that it sold the Philips Magnavox  
3 "14MS2331" television in its stores.

4 **Philips data:**

5 8. In the sales data produced by Philips (PHLP-CRT-130382-84), the Philips CRT  
6 televisions "14MS2331/17", "14MS2331/17B" and "14MS2331/17X" were sold to retailers and  
7 distributors in the following states: Alabama, Arkansas, California, Colorado, Connecticut, Florida,  
8 Georgia, Iowa, Illinois, Kansas, Kentucky, Louisiana, Massachusetts, Maryland, Michigan, Minnesota,  
9 Missouri, Montana, North Carolina, Nevada, New Jersey, New Mexico, New York, Ohio, Oklahoma,  
10 Pennsylvania, South Carolina, Tennessee, Texas, Utah, Virginia, Vermont, Washington, Wisconsin, and  
11 West Virginia.

12 **Damages Reports**

13 9. Attached hereto as Exhibit 1 is a true and correct copy of my Expert Report of Janet S.  
14 Netz Ph.D., dated April 15, 2014 ("Opening Report"). I was retained by IPPs to analyze the data and  
15 evidence produced in this litigation and estimate the damages to indirect purchaser class members in the  
16 22 statewide indirect purchaser classes (the "22 States"). This report contains the opinions I have  
17 formulated in this matter based on an extensive review and analysis of the data, the evidence of the  
18 conspiracy, and the CRT industry.

19 10. Attached hereto as Exhibit 2 is a true and correct copy of the Errata to the Expert Report  
20 of Janet S. Netz Ph.D., dated July 3, 2014. This report corrects the damages calculations in the Opening  
21 Report and recalculates the estimated damages to indirect purchasers in the 22 States to be \$2.8 billion.

22 11. Attached hereto as Exhibit 3 is a true and correct copy of the Janet S. Netz, Ph.D., Rebuttal  
23 to Supplemental Expert Report of Margaret E. Guerin-Calvert and Expert Report of Donald Clarke,  
24 dated April 27, 2022. This Rebuttal Report contains my opinions relating to the Chinese price laws and  
25 regulations that Irico asserts impacted its CRT prices during the Class Period.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed on September  
2 5, 2023, in Berkeley, California.

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5 Janet S. Netz  
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